#32664

US LIQUIDS DETROIT TREAMENT FACILITY

1923 FREDERICK ST DETROIT, MI 48211
#313-923-0080 FAX #313-923-3375

Conestoga Rovers and Associates
14496 Sheldon Rd
Suite 200
Plymouth, MI 48170
ATTN: Robert Schloesser

August 20, 2003

REGARDING: LETTER of AGREEMENT/SYBILL PROJECT

Dear Bob:

Thank you for the opportunity to provide a Letter of Agreement based on the information we discussed.

We are pleased to submit the following information about our disposal facility for your review and file:

Facility Name:	**US Liquids of Detroit**
Facility Address:	**1923 Frederick St., Detroit, MI 48211**
EPA ID #:	**MID 930-991-566**
Facility Contact:	**Jeffrey Marvin - #313-350-8522**
Estimated Waste Quantity:	**200 cubic yards and 250,000 gallons**
Waste Description:	**Non-Hazardous Sludge**
Method of Disposal:	**Chemical Fixation via Stabilization to Sub D Landfill**

Waste Characterization Requirements are as follows:

All waste streams are subject to the USL Detroit Waste Approval Plan as outlined in the USL Detroit Audit Manual - which includes the submittal of a **representative sample** for each waste stream, **analytical data** - for these types of waste streams the data typically includes a PCB Scan (presence of oil), TCLP Metals (sludges or solids), and an 8260 (organic scan) – additional analytical data maybe required based on the waste generating process or site history as described on the USL Waste Profile. USL – Detroit's Laboratory will also perform a **fingerprint analysis** on the samples submitted and on each truckload shipped prior to off-loading.

The fingerprint analysis includes at least a flashpoint test, PH strip, PCB Scan on all oils as well as a visual confirmation and an odor screen to ensure that the waste conforms to the information outlined on the waste profile.

USL Detroit agrees to accept the Sybill Project waste as specified

If I can be of any further assistance, please contact me at #313-350-8522.

Sincerely,

Jeffrey Marvin

Attachment: USL Detroit Audit Manual

Cc Debbie Ferrari – Customer Service

AUDIT INFORMATION GUIDE

US LIQUIDS OF DETROIT, INC.

1923 Frederick Street
Detroit, Michigan 48211
(313) 923-0080

MID 980 991 566

US LIQUIDS
Detroit Treatment Facility

US LIQUIDS
Detroit Treatment Facility

Dear guest,

It brings us great pleasure to welcome you to the ***US Liquids of Detroit*** treatment facility. We feel very fortunate to have you and to have the opportunity to showcase our facility. As you will discover during your visit, our employees take great pride in their work and in their facility.

The Detroit facility is one of more than 40 ***US Liquids, Inc.*** facilities nationwide, and provides a wide range of services for our customers.

US Liquids of Detroit handles a multitude of hazardous and non-hazardous liquids, solids, and debris. Using the latest protocols in the treatment of wastes such as acids, bases, reactives, metals, flammable solids, organics, and oxidizers, we receive and process nearly every characteristic and listed waste code identified in 40 CFR, Part 268.40 of the Land Disposal Restrictions.

In Operations, our wastewater treatment or ***Chemical Precipitation*** plant can store over one million gallons of water and other liquids. This includes 100,000 gallons of permitted hazardous liquid tanks, and an additional 230,000 gallons on our rail spur. In this area, we process 200,000 to 400,000 gallons of hazardous and non-hazardous liquids daily. Our stabilization or ***Chemical Fixation*** plant is capable of holding approximately 3,000 cubic yards (600,000 gallons) of solid and semi-solid wastes using seven large treatment tanks or *vaults*. These vaults are accessible by all truck and railcar types. In this area, we process approximately 650 to 1,000 tons of hazardous and non-hazardous solid waste every day. Our drum dock and container storage areas collectively provide for the staging and storing of nearly 4,000 drums (2,300 of which are hazardous). We routinely process over 200, 55-gallon drums per day.

Our laboratory, staffed with a team of experienced chemists, provides extensive technical support to our operations. It is capable in a very short time, of analyzing a broad range of wastes for a broad range of constituents, including volatile and semi-volatile organics, TCLP metals, and cyanides to name a few. Our laboratory staff also routinely conducts extensive treatment formulation studies.

Our Sales and Customer Service teams are extremely knowledgeable of the industry and the capabilities of our facility. We take great pride in the advancements we have made to simplify and streamline the waste approval and waste acceptance process. Our customers, both internal and external, are finding this facility to be exceptionally competent and easy to work with.

Our "behind-the-scenes" administrative personnel in Regulatory Compliance, Health and Safety, Waste Approvals, Waste Tracking, Transportation, Accounting, Records, Human Resources, and Information Management, all combine to form a highly technical and highly integrated team of professionals.

We encourage you to spend time looking around, visiting with our employees, and asking questions. We are certain that you will leave here with a great deal of understanding and confidence in what it is that we do.

Thank you for visiting us and enjoy your stay in the Motor City.

Sincerely,

US Liquids of Detroit, Inc. (USL)

US Liquids of Detroit, Inc.
1923 Frederick St. • Detroit, Michigan 48211 • 313 923-0080 • 800 495-6059 • Fax 313 923-3375

US LIQUIDS
Detroit Treatment Facility

We are proud to announce our change!!

US Liquids of Detroit, Inc.

Waste Treatment Facility

Dear Valued Customer:

As you know, City Environmental, Inc. (CEI) was acquired by US Liquids (USL) in May of 1998. We have reached a point in growth that demands recognition and redefinition. Our goal is to make USL of Detroit, Inc. synonymous with waste treatment.

We are very excited about all of the recent changes we have made and we hope that you have noticed our improvements! Our customers encourage us and they set our priorities. We look forward to partnering with you in a mutually rewarding relationship.

Please change your records to reflect our new name. All other pertinent information remains the same.

US Liquids of Detroit, Inc.
1923 Frederick Street
Detroit MI 48211
MID 980 991 566

Thank you for your prompt attention to this matter.

Sincerely,

US Liquids of Detroit, Inc. (USL)
(Formerly known as USL City Environmental, Inc.)

US Liquids of Detroit, Inc.
Audit Information Guide
Table of Contents

1. Owner Information
2. USL Facility Outline
3. USL Historical Data
4. USL Permits, Licenses and Insurance
5. Health and Safety Employee Training
6. Waste Analysis Plan
7. Contingency Plan and Emergency Procedures
8. Regulating Agencies
9. Off-Site Disposal
10. Financial Closure

Waste Approval Procedures (Addendum A)

US Liquids of Detroit, Inc.
Audit Information Guide
OWNER INFORMATION

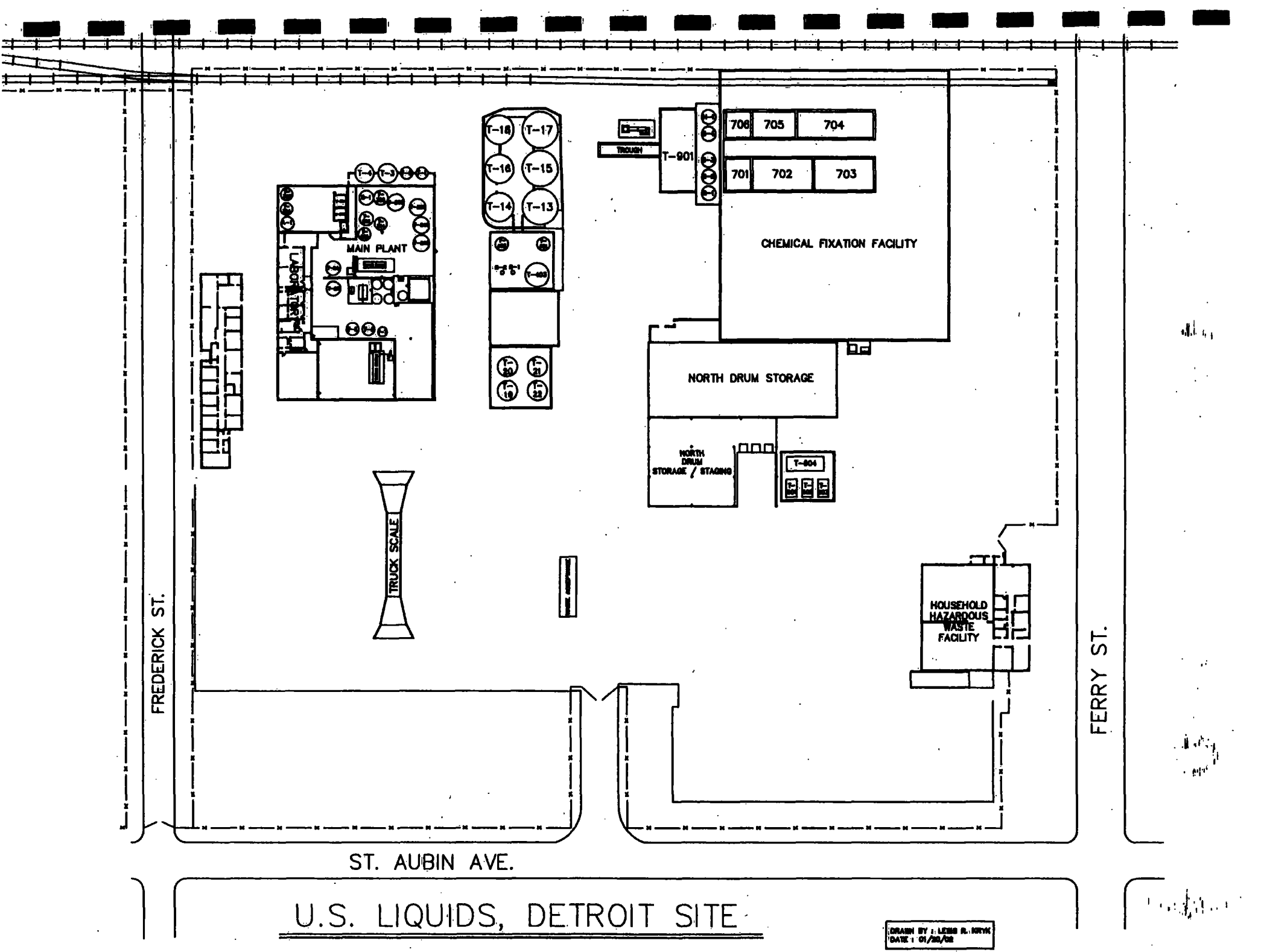
US Liquids Purchases City Environmental, Inc.

US Liquids (USL) acquired City Environmental, Inc. (CEI) of Detroit, Michigan on May 8, 1998.

Headquartered in Houston, Texas, USL, Inc. is a rapidly growing provider of integrated waste management services including collecting, processing, receiving and disposal services. The company operates 41 processing facilities located in eleven (11) States and services over 20,000 customers.

CEI was a division of City Management Corporation (CMC) which in turn is a subsidiary of USA Waste Services. For a period up to and including December 31, 1997, CMC was owned and operated as a private company. In January of 1998, USA Waste Services acquired CMC. USA Waste Services entered into negotiations with USL. The asset purchase was finalized on May 8, 1998.

USL treats and disposes hazardous and nonhazardous wastes generated by commercial, industrial, residential and governmental generators. The company operates its treatment facility in Detroit, Michigan, which is accessible by truck and rail.



U.S. LIQUIDS, DETROIT SITE

DRAWN BY : LESLIE R. NOYK
DATE : 01/20/92

US Liquids of Detroit, Inc.
Audit Information Guide
USL Facility Outline

US Liquids of Detroit, Inc.
Administrative Offices
Building – A

This building houses the Administrative Offices for USL along with the USL Sales and Customer Service Staff, Compliance and Accounting Departments.

Waste Water Treatment Facility
Main Plant
Building - B

See Acceptance Capabilities pages.

Bio Plant/Tank Storage Area
Building – C

This building just north of the Main Treatment Facility houses the activated-sludge wastewater pretreatment system. Most of the material treated here is landfill leachate. Wastewater derived from chemical precipitation operations will also be processed with the leachate. The building also contains the carbon absorption units, which are comprised of two carbon columns.

Drum Staging
Building – D

This building is connected to the Stabilization/Fixation Facility. The building can hold 1,100 drums with ample room to separate incompatible wastes.

Stabilization/Chemical Fixation Facility
Building – D

See attached Acceptance Capabilities pages.

Waste Acceptance Offices
Building – E

The building houses the Security Offices to which every vehicle must register with upon arrival at the facility. The building also contains the Waste Acceptance Offices where all drivers must submit their manifest/shipping papers and receive verification and direction for off-loading.

Household Hazardous Waste Facility
Building – F

The offices for the Household Waste Staff are in this building. This is the location where the household waste is segregated and/or bulked.

Acceptance Capabilities
Waste Water Treatment Facility
Main Plant Building – B

USL is a hazardous and nonhazardous industrial waste treatment facility located at 1923 Frederick Street, Detroit, Michigan 48211. The site is conveniently located near the intersection of Interstate Highways I-75 and I-94.

The Main Treatment Building is located in the center of the site, and houses the physical chemical treatment system. The area contains storage areas for drums, tanks for treatment, and raw materials needed for treatment.

USL accepts a variety of chemical and oily wastes at this wastewater treatment plant. A confidential pre-acceptance program ensures all waste streams are treated in compliance with Unites States EPA, Michigan Department of Environmental Quality (MDEQ) and local authority regulations and are compatible with USL design technology. This process includes sample submittal with a waste characterization through a thorough lab evaluation.

The Main Treatment Building accepts and processes hazardous and nonhazardous wastewater containing heavy metals, pressable sludges, and oily wastes. Heavy metals in liquid are reduced by chemical precipitation and clarification. Chemical treatment, via precipitation, is used as a method of removing emulsified oils. Sludges are dewatered using plate and frame filter press. The filtercake is taken to the stabilization facility and/or ultimately disposed of at an approved landfill.

Within the southeast portion of the Main Building is the Corrosive (acid/base) Treatment Area/Drum Storage Area. Acid wastes are handled and treated separately from other wastes. Tanks are specifically designed to treat these special wastes.

The USL Laboratory is located along the south side of the building. USL can handle all of your laboratory analysis required for approval. USL tests all treated bulk loads prior to landfilling.

Approved incoming waste streams are verified for compliance and off loaded in a timely fashion to avoid truck delays. The unloading sites are paved and provide ample space

for vehicles up to tanker-trailer size. This facility also has the ability to accept rail cars on-site.

Waste streams are treated through batch processes with several options available. This facility manages hazardous and nonhazardous liquids, pumpable sludges, oils and waters contaminated with oils. Treatment options include pH adjustment, bio treatment, oil/water separation, chemical precipitation, carbon absorption, acid/base neutralization, chemical oxidation/reduction, sludge conditioning and filter pressing. Effluents from the processes are discharged to the Detroit Water and Sewage Department (DWSD) under Permit No. 923-003.

This facility can receive bulk and containerized waste. The bulk storage capacity at the facility is nearly 1.4 million gallons. The drum storage capacity is 1,100 drums.

USL has the capacity and expertise to meet your waste treatment and disposal requirements. The Sales and Customer Service Department work hard to ensure that your waste streams are approved in a timely and efficient manner. USL provides services that result in an environmentally safe means of waste management.

Stabilization/Chemical Fixation Treatment Facility Building – D

USL is a chemical fixation/stabilization facility that accepts hazardous and nonhazardous industrial waste. The facility operations are housed within a pre-engineered metal structure that is attached to treatment/storage tanks/vaults. The active portions (i.e. vaults, pugmill, and shredder) are fully enclosed within the building. The site is conveniently located near the intersection of Interstate Highways I-75 and I-94.

USL accepts both bulk and drummed liquids, sludge's, slurries, solids and all difficult wastes. A confidential pre-acceptance program ensures all waste streams are treated in compliance with United States EPA, Michigan Department of Environmental Quality (MDEQ) and local authority regulations and are compatible with US design technology. This process includes sample submittal with a waste characterization through a thorough lab evaluation.

There are six (6) treatment vaults, which are steel constructed, rectangular in shape, built within a concrete containment structure. The outer concrete serves as a secondary containment structure and is sloped to a central low point. An inspection pipe located at the low point is designed to detect any free liquids accumulating in the interstitial space and may be used to remove such liquid.

The pugmill is a flow through devise. Wastes are fed and enter in the pugmill on the south end. The waste is mixed by paddles mounted on counter rotating shafts running the length of the unit, then discharged on the opposite end into a screw conveyer beneath the pugmill mixer. The screw conveyer carries the treated waste to the treatment vaults.

USL incorporates a mobile auger shredder to process drummed material, contaminated debris (concrete, metal, wood, etc.) and rock hard waste material. The mobile unit will be placed in front of a designated tank and/or vault. Drummed waste will be placed into the mix chamber by an elevated platform on the side of the shredder. The twin augers shred and mix the waste to a uniform consistency. Pozzolonic and other reagents may be added directly into the mix chamber or blended with the waste after it is placed in the vaults.

The storage area is completely covered which prevents precipitation from entering. The storage area is sloped to blind sumps which serve as a collection point for liquids in the event of spills/leaks in the storage area. Containers are stored in a manner that will contain potential leaks/spills within a curbed area. The container storage and blind sumps are inspected daily. Accumulated liquids are removed with a vacuum truck.

This facility utilizes pre-treatment (when necessary) followed by chemical fixation/stabilization of organic and inorganic hazardous and non-hazardous wastes using lime, cement flue dust, fly ash, silicate bearing compounds and other bulking agents to treat and solidify.

USL will also utilize chemical absorption characteristics of activated carbon for the fixation of some organic compounds, displaying a RCRA, Michigan listing or characteristics. Pre-treatment such as chemical oxidation, reduction and/or alkaline chlorination might precede stabilization. Treatment will be conducted in tanks, or containers such as roll off boxes using a pugmill, shredder and/or mechanical means such as a front end loader or backhoe. Plant permitted capacity is 300 tons per hour. All nonhazardous and characteristic waste materials accepted at USL are solidified and disposed of in a state-of-the-art Subtitle D landfill. Listed wastes are treated, solidified and disposed of in a hazardous landfill.

This operation can receive waste in bulk (gallon, yard, ton) or containers such as drums. The new stabilization/chemical fixation facility can also accept waste by railcar.

US Liquids of Detroit, Inc.
Audit Information Guide
USL Historical Data

SITE LOCATION

USL's physical address is:

US Liquids of Detroit, Inc.
1923 Frederick Street
Detroit, Michigan 48211

The area immediately adjacent to the facility is primarily commercial and industrial. The nearest residential homes are located within 0.5 miles to the east.

SITE HISTORY

USL was acquired by US Liquids (USL) on May 8, 1998. Prior to that, the facility was owned by USA Waste from January 14, 1998 and City Management Corporation (CMC) since 1964.

The original lot was reportedly purchased by Leonard Reliable Storage from James Witherell Farm in 1908. The Detroit Foundry Supply occupied the site from 1914 to 1925. The Detroit Cleveland Warehouse and Reality Company and Michigan Trust Company were reportedly owned from 1925 to 1929.

Phoenix Wire Works held the property for the longest period, from 1927 to 1966. The Detroit Rendering Company conducted operations at the site from 1982 to 1984.

UTILITIES

The following utilities service the site:

- Water and Sewer – Detroit Water and Sewer Department
- Natural Gas – Michigan Consolidated Gas Company
- Electricity – Detroit Edison

The facility also has a boiler that generates steam for the film evaporator.

SURROUNDING LAND USE AND POPULATION

USL is located within a commercial area in the City of Detroit, which has a population of approximately 1,000,000. There are an estimated 500 people living within one (1) mile of the site, and an estimated 1,000 live within (3) miles.

The nearest residence is approximately 0.24 miles east of the site. The facility is bounded by the following no easements cross the site:

- North Ferry Road and a transfer facility owned by Waste Management
- South Frederick Street
- East St. Aubin Street
- West Grand Trunk Railroad

SURFACE WATER

The original topography is fairly level, with relief of approximately 5 feet over the site. The site elevation is approximately 630 feet above Mean See Level (MSL), and the site slopes gently towards the northwest. There are no lakes, streams or wetland on the property. Surface water runoff either flows to the spill pond, the City Sewer System, or off-site. The nearest surface water body is the Detroit River, which is located approximately 2.5 miles to the east; the river is not directly used as a source of drinking water. This river flows south to Lake Erie, which is used as a source of drinking water. USL is included in the group NPDES storm water permit, but this facility is not required to perform storm water sampling.

A collection system topography is fairly level, with relief of approximately 5 feet over the site. This storm water is discharging to the DWSD after treatment.

GEOLOGY AND HYDROGEOLOGY

Surfical materials at USL consist of sand and fill, which extends to a depth of 4 to 5 feet.

Local geology consists of unconsolidated glacially derived silty clays that may extend to more than 100 feet in depth. There may be sand and/or silt units possessing varying permeability's interspersed with the clay.

Environmental investigations conducted at the site did not detect the presence of ground water contamination. Depth to shallow ground water in the area is approximately 40 feet below grade and may flow in a south-southeast direction.

There are no known ground water users located within 1 mile of USL. Drinking water in the area is supplied by the City of Detroit, and there are no portable water wells located on the property.

AIR ASSESSMENT DATA

Normal maximum temperatures are 80 degrees F in July, and normal minimum temperatures are 20 degrees F in January. Average annual precipitation is 32.1 of rain and 41.2 of snowfall. Winds are predominantly from the north. It is anticipated that an air emission release would travel southward, although the actual path of migration would vary with the yearly average wind speed at approximately 10 miles per hour.

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0034 Expires 8-30-96
GSA No. 0246-EPA-OT

EPA

Hazardous Waste Permit Application Part A

(Read the instructions before completing)

Date Received (Month / Day / Year)

I. Installation's EPA ID Number (Mark X in the appropriate box)

[ ] A. First Part A Submission [X] B. Part A Amendment

C. Installation's EPA ID Number: MID980991566

D. Secondary ID Number(s) (If applicable):

E. Name of Facility: US LIQUIDS OF DETROIT INC

II. Facility Location (Physical address, not P.O. Box or Route Number)

A. Street: 1923 FREDERICK STREET

Street (Continued):

City or Town: DETROIT | State: MI | Zip Code: 48211-2603

County Code: 082 | County Name: WAYNE

B. Land Type: P | C. Geographic Location: LATITUDE (Degrees, Minutes, & Seconds): 42 22 02 | LONGITUDE (Degrees, Minutes, & Seconds): 083 02 05 3 | D. Facility Existed On: Month 09 Day 01 Year 1985

III. Facility Mailing Address

Street or P.O. Box: 1923 FREDERICK STREET

City or Town: DETROIT | State: MI | Zip Code: 48211-2603

IV. Facility Contact (Person to be contacted regarding waste activities at facility)

Name (Last): SCHNEIDER | (First): STEVEN

Job Title: DISTRICT MGR | Phone Number (Area code and Number): 313-923-0080

V. Facility Contact Address (See instructions)

A. Contact Address Location: [ ] Same [X] Different

B. Street or P.O. Box: 1923 FREDERICK STREET

City or Town: DETROIT | State: MI | Zip Code: 48211-2603

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

EPA I.D. Number (Enter from page 1): M I D 9 8 0 9 9 1 5 6 6

Secondary ID Number (Enter from page 1):

VII. Operator Information (See instructions)

Name of Operator: U S LIQUIDS OF DETROIT INC

Street or P.O. Box: 1923 FREDERICK STREET

City or Town: DETROIT

State: MI

ZIP Code: 48211-2603

Phone Number (Area Code and Number): 313-923-0080

B. Operator Type: P

C. Change of Operator Indicator: Yes [ ] No [X]

Date Changed (Month / Day / Year):

VIII. Facility Owner (See instructions)

A. Name of Facility's Legal Owner: U S LIQUIDS OF DETROIT INC

Street or P.O. Box: 1923 FREDERICK STREET

City or Town: DETROIT

State: MI

ZIP Code: 48211-2603

Phone Number (Area Code and Number): 313-923-0080

B. Owner Type: P

C. Change of Owner Indicator: Yes [ ] No [X]

Date Changed (Month / Day / Year):

IX. SIC Codes (4-digit, in order of significance)

Primary	(Description)	Secondary	(Description)
4953	REFUSE SYSTEMS		

Secondary	(Description)	Secondary	(Description)

X. Other Environmental Permits (See instructions)

A. Permit Type (Enter code)	B. Permit Number	C. Description
	923-003	POTW DISCHARGE PERMIT
	C10942-C10955	WAYNE COUNTY AIR PERMIT
	8720	MDEQ SOLID WASTE PERMIT

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 9-30-96 GSA No. 0248-EPA-OT

EPA I.D. Number (Enter from page 1)

M I D 9 8 0 9 9 1 5 6 6

Secondary ID Number (Enter from page 1)

XI. Nature of Business (Provide a brief description)

SEE ATTACHMENT

XII. Process Codes and Design Capacities

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item XIII.

B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.

1. AMOUNT - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	Disposal:	
D79	Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet or Hectare-meter
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day r Liters Per Day
D83	Surface Impoundment	Gallons or Liters
D99	Other Disposal	Any Unit of Measure Listed Below
	Storage:	
S01	Container (Barrel, Drum, Etc.)	Gallons or Liters
S02	Tank	Gallons or Liters
S03	Waste Pile	Cubic Yards or Cubic Meters
S04	Surface Impoundment	Gallons or Liters
S05	Drip Pad	Gallons or Liters
S06	Containment Building-Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below
	Treatment:	
T01	Tank	Gallons Per Day or Liters Per Day
T02	Surface Impoundment	Gallons Per Day or Liters Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or Btu's Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T80	Boiler	Gallons or Liters
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour (T81–T86)
T82	Lime Kiln	
T83	Aggregate Kiln	
T84	Phosphate Kiln	
T85	Coke Oven	
T86	Blast Furnace	
T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour (T87–T93)
T88	Titanium Dioxide Chloride Process Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
T92	Halogen Acid Furnaces	
T93	Other Industrial Furnaces Listed In 40 CFR §260.10	
T94	Containment Building-Treatment	Cubic Yards or Cubic Meters
	Miscellaneous (Subpart X):	
X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; or Kilograms Per Hour
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
X04	Geologic Repository	Cubic Yards or Cubic Meters
X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liters Per Hour	H
Liters Per Day	V
Short Tons Per Hour	D
Metric Tons Per Hour	W
Short Tons Per Day	N
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	R
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
Btu's Per Hour	I

EPA I.D. Number (Enter from page 1): M I D 9 8 0 9 9 1 5 6 6

Secondary ID Number (Enter from page 1):

XII. Process Codes and Design Capabilities (Continued)

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	B. 2. Unit Of Measure (Enter code)	C. Process Total Number Of Units	For Official Use Only
X 1	S 0 2	5 3 3 7 8 8	G	0 0 1	
1	S 0 1	RAIL CONTAINER 2 3 0 . 0 0 0	G	010	
2		NORTH DRUM STORAGE 6 0 . 5 0 0	G	1,100	
3		NORTH DRUM STAGING, STORAGE 4 7 . 8 5 0	G	870	
4		CORROSIVE DRUM PAD 9 . 3 5 0	G	170	
5		CHEM PRECIP DRUM PAD 3 . 8 5 0	G	070	
6		PORTABLE CONTAINERS 4 8 . 8 5 0	G	008	
7		ROLL-OFF BOXES .			
8		CHEM-FIXATION DRUM STORAGE 6 . 6 0 0	G	120	
9	S 0 2	900 SERIES 1 4 0 . 0 0 0	G	001	
10		800 SERIES 8 8 0 . 0 0 0	G	005	
11		700 SERIES 4 2 2 . 7 8 6	G	006	
12		600 SERIES 3 0 . 0 0 0	G	003	
13		400 SERIES 2 4 . 0 0 0	G	002	

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, starting with the line after the last line that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item XIII.

XIII. Other Processes (Follow instructions from Item XII for D99, S99, T04 and X99 process codes)

Line Number (Enter #s in seq w/XII)	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	B. 2. Unit Of Measure (Enter code)	C. Process Total Number Of Units	D. Description Of Process
X 1	T 0 4				In-situ Vitrification
1	T 0 1	4.3×10^5	U	02	CARBON COLUMNS
2	T 0 1	4.32×10^5	U	09	CHEMICAL WASTEWATER TREATMENT
3	T 0 1	6.75×10^5	U	07	BIO TREATMENT
4	T 0 4	150 TONS/HOUR	D	01	PUGMILL

a. **Waste Water Treatment:** USL City Environmental, Inc. - Frederick (USL CEI) manages hazardous and non-hazardous liquids, pumpable sludges, and waters contaminated with oils. Storage capacity is 2.0 million gallons. Treatment consists of chemical precipitation, acid/base neutralization pickle liquor with lime and neutralization decharacterization chemical oxidation/reduction, biological treatment, carbon adsorption, alkaline chlorination, treatment of residue, sludge conditioning, and sludge dewatering (e.g. filter press). Solidification will be discussed in (b) as a separate description. Effluents from the processes are discharged to the DWSD (Detroit Water and Sewage Department) under Permit #923-003.

b. **Chemical Fixation Solidification:** This facility utilizes chemical fixation/solidification of organic and inorganic hazardous, non-hazardous wastes and flourescent light bulbs using lime, cement flue dust, fly ash, silicate bearing compounds and other bulking agents to treat and solidify the wastes. USL CEI will also utilize the chemical adsorption characteristic of activated carbon for the fixation of organic compounds, displaying a RCRA, Michigan listing or characteristics. Pretreatment such as chemical oxidation, reduction and/or alkaline chlorination might precede stabilization. Treatment will be conducted in tanks, or containers such as roll-off boxes using a pugmill, shredder and/or mechanical means such as a front end loader or a backhoe. Capacity is 300 tons per hour based on 24 hour day and seven days per week.

This facility will receive wastes in bulk, (gallon, yard, ton) or containers such as drums, roll-offs, railcars, totes and dump trailers.

Waste subject to "CC" Air Emission Controls are pretreated in dedicated roll-off containers in compliance with 40 CFR 264 Subpart CC regulations.

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only.

Form Approved. OMB No. 2050-0024 Expires 8-31-96
GSA No. 0246-GEA

EPA I.D. Number (Enter from page 1): M I D 9 8 C 9 9 7 5 6 6

Secondary ID Number (Enter from page 1):

XII. Process Codes and Design Capabilities (Continued)

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	B. 2. Unit Of Measure (Enter code)	C. Process Total Number Of Units	For Official Use Only
X 1	S 0 2	5 3 3 7 8 8	G	0 0 1	
1	S 0 2	300 SERIES 45.600	G	005	
2		200 SERIES 84.600	G	008	
3		SILO H-1 41.208	G	001	
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for other processes (i.e., D99, S99, T04 and X99) in Item XIII.

XIII. Other Processes (Follow instructions from Item XII for D99, S99, T04 and X99 process codes)

Line Number (Enter # to continue from Item XII)	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	B. 2. Unit Of Measure (Enter code)	C. Process Total Number Of Units	D. Description Of Process
X 1	T 0 4				Treatment Application
1	T 0 4	75 TONS/HOUR	D	02	SHREDDERS
2	T 0 4	20 TONS/HOUR	D	02	FILTER PRESSES
3	T 0 4	3.64×10^4	U	02	"CC" ROLL-OFF BINES
4	T 0 4	2.4×10^4	U	08	BULKING

EPA I.D. Number *(Enter from page 1)* | Secondary ID Number *(Enter from page 1)*

XIV. Description of Hazardous Wastes

A. EPA HAZARDOUS WASTE NUMBER - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. ESTIMATED ANNUAL QUANTITY - *For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C. UNIT OF MEASURE - *For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES

For listed hazardous wastes: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A on page 4 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code (s) from the list of process codes contained in item XII A on page 4 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. *Enter the first two as described above.*
2. *Enter "000" in the extreme right box of item XIV-D (1).*
3. *Enter in the space provided on page 7, item XIV-E, the line number and the additional code(s).*

2. PROCESS DESCRIPTION - *If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).*

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER: Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. *Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.*
2. *In column A on the next line enter one of the remaining EPA Hazardous Waste Numbers that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.*
3. *Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS (1) PROCESS CODES (Enter code)	D. PROCESS (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X 1	K 0 5 4	900	P	T 0 3 D 8 0	
X 2	D 0 0 2	400	P	T 0 3 D 8 0	
X 3	D 0 0 1	100	P	T 0 3 D 8 0	
X 4	D 0 0 2				Included With Above

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0034 Expires 9-30-99
GSA No. 0248-EPA-GT

EPA I.D. Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
M I D 9 8 0 9 9 1 5 6 6	

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature	Date Signed 5-16-02
Name and Official Title (Type or print): Eddie Ascione Regional Vice President	
Owner Signature	Date Signed
Name and Official Title (Type or print)	
Operator Signature	Date Signed 5/16/02
Name and Official Title (Type or print): Dean D'Angelo Operations Manager	
Operator Signature	Date Signed
Name and Official Title (Type or print)	

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)

CITY OF DETROIT
WATER AND SEWERAGE DEPARTMENT
INDUSTRIAL WASTE CONTROL DIVISION

303 S. LIVERNOIS AVENUE
DETROIT, MICHIGAN 48209
PHONE 313•297•9400
FAX 313•297•9429
WWW.CI.DETROIT.MI.US

WASTEWATER DISCHARGE PERMIT
PERMIT NO.: 923-003

SECTION A: GENERAL INFORMATION

Facility I.D. No.: 010901

Company Name: US Liquids of Detroit

Facility Address: 1923 Frederick Street
Detroit, MI 48211

Mailing Address: 1923 Frederick Street
Detroit, MI 48211

The Detroit Water and Sewerage Department (DWSD) hereby authorizes the Industrial User specified above to discharge industrial wastewater to the City of Detroit sewer system. This authorization is granted in accordance with the City's Wastewater Discharge Ordinance or equivalent local ordinance and any applicable provisions of federal or state laws or regulations.

The requirements and conditions established in this permit do not relieve the company of its obligation to comply with any applicable pretreatment regulations, standards, requirements, or laws that may become effective during the term of this permit.

In addition, this permit is granted in accordance with the application filed with DWSD, and in conformity with plans, specifications, and other substantive data submitted to the Department in support of the above application.

To continue discharging industrial wastewater after the expiration date, it is the responsibility of the Industrial User to submit an application for permit reissuance at least ninety (90) days before the expiration of the existing permit. The permit reapplication form may be requested from this Department.

Effective Date: January 11, 2002

Expiration Date: December 21, 2003

Issued by:

Stephen J. Kuplicki
Manager, IWC

Authorized by:

Kathleen Leavey
Interim Director

DEQ

Michigan Department of Environmental Quality
Waste Management Division

SOLID WASTE DISPOSAL AREA OPERATING LICENSE

This license is issued under the provisions of Part 115, Solid Waste Management of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, MCL 324.11501 et seq. (Part 115), and authorizes the operation of this solid waste disposal area (Facility) in the state of Michigan. This license does not obviate the need to obtain other authorizations as may be required by state law.

FACILITY NAME: US Liquids of Detroit, Inc.

LICENSEE/OPERATOR: US Liquids of Detroit, Inc.

FACILITY OWNER: US Liquids of Detroit, Inc.

PROPERTY OWNER: US Liquids of Detroit, Inc.

FACILITY TYPE(S): Solid Waste Processing Plant

FACILITY ID NUMBER: 82-000089

COUNTY: Wayne

LICENSE NUMBER: 8891

ISSUE DATE: September 12, 2002

EXPIRATION DATE: September 12, 2004

FACILITY DESCRIPTION: The US Liquids of Detroit, Inc., a Solid Waste Processing Plant, consists of 11.3 acres located at 1923 Frederick Street, City of Detroit, Wayne County, Michigan, as identified in Attachment A and fully described in this license.

AREA AUTHORIZED FOR DISPOSAL OF SOLID WASTE: Identified in Attachment A of this license.

RESPONSIBLE PARTY: Mr. Steven Schneider, District Manager
US Liquids of Detroit, Inc.
1923 Frederick Street
Detroit, Michigan 48211
313-923-0080

RENEWAL OPERATING LICENSE: This License Number 8891 supersedes and replaces Solid Waste Disposal Area License Number 8720 issued to USL-City Environmental, Inc., on August 18, 2000.

This license is subject to revocation by the Director of the Michigan Department of Environmental Quality (Director) if the Director finds that this Facility is not being constructed or operated in accordance with the approved plans, the conditions of a permit or license, Part 115, or the rules promulgated under Part 115. Failure to comply with the terms and provisions of this license may result in legal action leading to civil and/or criminal penalties pursuant to Part 115. This license shall be available through the licensee during its term and remains the property of the Director.

THIS LICENSE IS NOT TRANSFERABLE.

Joan H. Peck

Joan H. Peck, Chief, Solid Waste Program
Waste Management Division

MARSH USA INC.

CERTIFICATE OF INSURANCE

CERTIFICATE NUMBER: HOU-00033870-00

PRODUCER

MARSH USA INC.
SUITE 4000
1000 LOUISIANA
HOUSTON, TX 77002-5008

FREDD

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER OTHER THAN THOSE PROVIDED IN THE POLICY. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES DESCRIBED HEREIN.

INSURED

US Liquids of Detroit, Inc.
1923 Frederick Street
Detroit, MI 48211

COMPANIES AFFORDING COVERAGE

COMPANY A: LIBERTY MUTUAL FIRE INSURANCE COMPANY

COMPANY B: NATIONAL UNION FIRE INS. CO. OF PITTSBURGH, PA

COMPANY C: GREENWICH INSURANCE COMPANY

COMPANY D:

COVERAGES This certificate supersedes and replaces any previously issued certificate for the policy period noted below.

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE DESCRIBED HEREIN HAVE BEEN ISSUED TO THE INSURED NAMED HEREIN FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THE CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, CONDITIONS AND EXCLUSIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS	
A	GENERAL LIABILITY	RG2 691 004163 042	09/04/02	09/04/03	GENERAL AGGREGATE	$ 2,000,000
	[X] COMMERCIAL GENERAL LIABILITY				PRODUCTS - COMP/OP AGG	$ 2,000,000
	[ ] CLAIMS MADE [X] OCCUR				PERSONAL & ADV INJURY	$ 1,000,000
	[ ] OWNER'S & CONTRACTOR'S PROT				EACH OCCURRENCE	$ 1,000,000
	[X] Per Project Aggregate				FIRE DAMAGE (Any one fire)	$ 100,000
					MED EXP (Any one person)	$ 5,000
A	AUTOMOBILE LIABILITY	AS2 691 004163 032	09/04/02	09/04/03	COMBINED SINGLE LIMIT	$ 1,000,000
	[X] ANY AUTO				BODILY INJURY (Per person)	$
	[ ] ALL OWNED AUTOS				BODILY INJURY (Per accident)	$
	[ ] SCHEDULED AUTOS				PROPERTY DAMAGE	$
	[X] HIRED AUTOS					
	[X] NON-OWNED AUTOS					
	[X] MCS - 90 Endorsement					
	GARAGE LIABILITY				AUTO ONLY - EA ACCIDENT	$
	[ ] ANY AUTO				OTHER THAN AUTO ONLY:	
					EACH ACCIDENT	$
					AGGREGATE	$
	EXCESS LIABILITY	BE 7409144	09/04/02	09/04/03	EACH OCCURRENCE	$ 25,000,000
	[X] UMBRELLA FORM				AGGREGATE	$ 25,000,000
	[ ] OTHER THAN UMBRELLA FORM					$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY	WA2 69D 004163 012	09/04/02	09/04/03	[X] WC STATUTORY LIMITS [ ] OTHER	
A		WC2 691 004163 022	09/04/02	09/04/03	EL EACH ACCIDENT	$ 1,000,000
	THE PROPRIETOR/ PARTNERS/EXECUTIVE OFFICERS ARE: [X] INCL [ ] EXCL				EL DISEASE-POLICY LIMIT	$ 1,000,000
					EL DISEASE-EACH EMPLOYEE	$ 1,000,000
	OTHER					
C	Pollution Liability including Professional	PEC000537701	09/04/01	04/01/03	Per Occurrence	5,000,000
					Aggregate	5,000,000

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS (LIMITS MAY BE SUBJECT TO DEDUCTIBLES OR RETENTIONS)

CERTIFICATE HOLDER

CANCELLATION

SHOULD ANY OF THE POLICIES DESCRIBED HEREIN BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE INSURER AFFORDING COVERAGE WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED HEREIN, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER AFFORDING COVERAGE, ITS AGENTS OR REPRESENTATIVES.

MARSH USA INC.
BY: K. Bayard K. Bayard

MMI (9/99) VALID AS OF 09/04/02

US Liquids of Detroit, Inc.
Audit Information Guide
Health and Safety Employee Training

Who are Hazardous Waste Workers?

HW Workers are highly skilled, well trained people who:

- Work with hazardous substances>30 days/year or
- Wear respirators>30 days/year or
- Could be instructed to assist in an Emergency Response

The Special "Care and Training" of HW Workers

HW Workers are specially trained & equipped:

- To protect their health
- To promote safety
- To protect the environment
- To protect public health

Medical Surveillance and Environmental Monitoring show it works.

Safety & Health Care Programs for HW Workers

Michigan's Occupational Safety and Health Act (MIOSHA) requires USL to train all HW Workers about:

- HAZWOPER Written Health and Safety Program
- Personal Protective Equipment and Respiratory Protection Programs
- HAZWOPER Training; 40 hour initial plus 8 hour refresher

HAZWOPER Written Health and Safety Programs

- Required by OSHA (29) CFR 1910.120) and MIOSHA at R325.52101-7
- Identifies site hazards and ways to eliminate or reduce them
- Promotes proper use of PPE and respiratory protection
- Includes Training Program and Emergency Response Film

Personal Protective Equipment (PPE) and Respiratory Protection

Minimize chemical exposure. USL Health and Safety Program includes:

- Medical Surveillance: Initial, Exit, & Periodic
- Written instructions with maps describing what equipment to use
- Same standards apply equally to Transporters, Contractors, & USL Operators

HAZWOPER Training

Basic requirements for working at "controlled"HW sites are:

- 40 Hour "Initial"
- 8 Hour "Refresher" annually

Upgrade for working at "uncontrolled" HW sites are:

- 8 Hour Supervisory

40 Hour Training

The outline of this course is as follows:

Environmental Regulation Awareness Overview

Introduction to Hazardous Materials, Chemical Substances and Wastes

Regulation Overviews:

- Hazardous Materials Transportation Act
- Hazard Communication
- Hazardous Waste Operations and Emergency Response
- Occupational Exposures to Hazardous Chemicals in Laboratories
- Resource Conservation and Recovery Act
- Comprehensive Environmental Response, Compensation, and Liability Act
- Super-fund Amendments and Re-authorization Act Summary

29 CFR 1910.120 HAZWOPER

- Definitions
- Safety and Health Program
- Site Characterization Analysis
- Site Control
- Training
- Medical Surveillance
- Engineering Controls, Work Practices and PPE
- Monitoring
- Informational Program
- Handling Drums and Containers
- Decontamination
- Emergency Response by Employees at Uncontrolled Hazardous Waste Sites
- Illumination
- Sanitation at Temporary Workplaces
- New Technology Programs

HAZARDOUS WASTE SITE CHECKLIST

- Safety and Health Checklist
- Site Characterization and Analysis
- Site Control

PHYSICAL HAZARDS OF HAZARDOUS MATERIALS

- Physical Forms of Chemicals
- Physical Hazards
- Physical Characteristics

HEALTH HAZARDS OF HAZARDOUS MATERIALS

- Routes of Exposure
- Degree of Hazard
- Signs and Symptoms of Overexposure
- Acute and Chronic Effects

CONTROLLING EXPOSURES TO HAZARDOUS SUBSTANCES

- Detecting Chemical Exposures

RECOGNIZING AND IDENTIFYING HAZARDOUS MATERIALS

- Clues for Detecting Hazardous Materials Presence
- Limitations of Identification Systems
- Sources of Information

    Published Materials
    Computer Resources (Databases and Programs)
    Telephone Assistance Hotlines

- Cargo Tank Trucks
- Railroad Tank Cars
- Railroad Tank Car Specification Marking System
- Atmospheric and Low Pressure Liquid Storage Tanks
- Pressurized Storage Vessels

CONFINED SPACE ENTRY PROCEDURES

- Confined Spaces
- Procedures
- Testing for Hazardous Atmospheres
- Permit Issuer
- Authorized Entrants
- Attendants
- Rescue Team

CONFINED SPACE ENTRY PROCEDURES (Continued...)

- Personal Protective Equipment
- Instrumentation
- Rescue Equipment
- Outside Contractors
- Pre-Entry Briefing
- Confined Space Risk Assessment Work-Sheet

SAFETY TRAINING PROCEDURES

Training procedures meet or exceed all MIOSH/OSHA/RCRA requirements.

PROTECTIVE CLOTHING

USL requires, at a minimum, that all employees wear uniforms, steel toe shoes, hard hats, safety glasses or shield, and when necessary, tyvek suits and respiratory equipment.

CHEMICAL EXPOSURE PREVENTION AND TRAINING

Prevention and training include air monitoring, weekly safety inspection, 40-hour OSHA Health and Safety/Written Hazardous Communication/Right to Know/First Aid Training and/or on the job training Chemical Handling Workshops presented by Chemical Vendors (when warranted), Chemistry for Non-Chemists Seminars presented by area universities.

CHEMICAL EXPOSURE MONITORING

Outside Contractor Air Monitoring Services (if needed), In-House Industrial Health Specialist Services (if needed), Annual Medical Monitoring Badges (if needed), and Oxygen/LED/Toxicity Meter for confined space entry procedures.

COMPLETE HEALTH AND SAFETY GUIDE IS AVAILABLE

ON SITE FOR INSPECTION

US Liquids of Detroit, Inc.
Audit Information Guide
Waste Analysis Plan

40 CFR 264.13 (b), (c), 40 CFR 270.14 (b) (2), (3) and MI ACT 451 R299.9504 (1)c

Federal Regulations 40 CFR 270.14 (b)(2), (3) and 40 CFR 264.13(b) and State Regulations MI ACT 451 rules R299.9508(1)(b) and R299.9504(1)(c) require the owner or operator of hazardous waste storage facilities to develop and follow a written Waste Analysis Plan describing the overall operational procedures which will be carried out to manage hazardous waste at the facility.

COMPLETE WASTE ANALYSIS PLAN IS AVAILABLE ON-SITE FOR INSPECTION

ACCEPTABLE WASTE CODES

The following is a list of waste codes covered under the Interim Part A Permit filed by USL. Although all waste codes are permitted, any listed wastes will be accepted only on a case by case basis. All waste streams will require a completed profile, sample and MSDS or analytical, as required by the USL Approvals Department. If there are any questions regarding the analytical requirements for waste acceptance, please contact your sales representative or the Customer Service Department. USL can accept all characteristic waste liquids, sludges and solids.

WASTE CODES ACCEPTED AT THE FACILITY

D001	F006	K027	K098	P005	P063	P121	U025	U078	U130	U183	U246	U399
D002	F007	K028	K099	P006	P064	P122	U026	U079	U131	U184	U247	U400
D003	F008	K029	K100	P007	P065	P123	U027	U080	U132	U185	U248	U401
D004	F009	K030	K101	P008	P066	P127	U028	U081	U133	U186	U249	U402
D005	F010	K031	K102	P009	P067	P128	U029	U082	U134	U187	U271	U403
D006	F011	K032	K103	P010	P068	P185	U030	U083	U135	U188	U277	U404
D007	F012	K033	K104	P011	P069	P187	U031	U084	U136	U189	U278	U405
D008	F019	K034	K105	P012	P070	P188	U032	U085	U137	U190	U279	U406
D009	F020	K035	K106	P013	P071	P189	U033	U086	U138	U191	U280	U407
D010	F021	K036	K107	P014	P072	P190	U034	U087	U140	U192	U328	U408
D011	F022	K037	K108	P015	P073	P191	U035	U088	U142	U193	U353	U409
D012	F023	K038	K109	P016	P074	P192	U036	U089	U143	U194	U359	U410
D013	F024	K039	K110	P017	P075	P193	U037	U090	U144	U196	U361	U411
D014	F025	K040	K111	P018	P076	P194	U038	U091	U145	U197	U362	
D015	F026	K041	K112	P020	P077	P195	U039	U092	U146	U200	U363	
D016	F027	K042	K113	P021	P078	P196	U041	U093	U147	U201	U364	
D017	F028	K043	K114	P022	P081	P197	U042	U094	U148	U202	U365	
D018	F032	K044	K115	P023	P082	P198	U043	U095	U149	U203	U366	
D019	F034	K045	K116	P024	P084	P199	U044	U096	U150	U204	U367	
D020	F035	K046	K117	P026	P085	P200	U045	U097	U151	U205	U368	
D021	F037	K047	K118	P027	P087	P201	U046	U098	U152	U206	U369	
D022	F038	K048	K123	P028	P088	P202	U047	U099	U153	U207	U370	
D023	F039	K049	K124	P029	P089	P203	U048	U101	U154	U208	U371	
D024		K050	K125	P030	P092	P204	U049	U102	U155	U209	U372	
D025		K051	K126	P031	P093	P205	U050	U103	U156	U210	U373	
D026	K001	K052	K131	P033	P094		U051	U105	U157	U211	U374	
D027	K002	K060	K132	P034	P095		U052	U106	U158	U213	U375	
D028	K003	K061	K136	P036	P096	U001	U053	U107	U159	U214	U376	
D029	K004	K062	K140	P037	P097	U002	U055	U108	U160	U215	U377	
D030	K005	K064	K141	P038	P098	U003	U056	U109	U161	U216	U378	
D031	K006	K065	K142	P039	P099	U004	U057	U110	U162	U217	U379	
D032	K007	K066	K143	P040	P101	U005	U058	U111	U163	U218	U380	
D033	K008	K069	K144	P041	P102	U006	U059	U112	U164	U219	U381	
D034	K009	K070	K145	P042	P103	U007	U060	U113	U165	U220	U382	
D035	K010	K071	K147	P043	P104	U008	U061	U114	U166	U221	U383	
D036	K011	K072	K149	P044	P105	U009	U062	U115	U167	U222	U384	
D037	K013	K073	K150	P045	P106	U010	U063	U116	U168	U223	U385	
D038	K014	K083	K151	P046	P107	U011	U064	U117	U169	U225	U386	
D039	K015	K084	K156	P047	P108	U012	U066	U118	U170	U226	U387	
D040	K016	K085	K157	P048	P109	U014	U067	U119	U171	U227	U388	
D041	K017	K086	K158	P049	P110	U015	U068	U120	U172	U228	U389	
D042	K018	K087	K159	P050	P111	U016	U069	U121	U173	U234	U390	
D043	K019	K088	K160	P051	P112	U017	U070	U122	U174	U235	U391	
	K020	K090	K161	P054	P113	U018	U071	U123	U176	U236	U392	
	K021	K091		P056	P114	U019	U072	U124	U177	U237	U393	
F001	K022	K093		P057	P115	U020	U073	U125	U178	U238	U394	
F002	K023	K094	P001	P058	P116	U021	U074	U126	U179	U239	U395	
F003	K024	K095	P002	P059	P118	U022	U075	U127	U180	U240	U396	
F004	K025	K096	P003	P060	P119	U023	U076	U128	U181	U243	U397	
F005	K026	K097	P004	P062	P120	U024	U077	U129	U182	U244	U398	

MICHIGAN HAZARDOUS WASTE CODES

Note: Final waste stream approval subject to sample analysis and review.

	025U	071U	115U
	027U	072U	116U
	028U	073U	117U
001S	029U	074U	118U
002S	030U	075U	119U
003S	031U	076U	120U
004S	032U	077U	121U
005S	033U	078U	122U
006S	034U	079U	124U
007S	036U	080U	127U
	037U	082U	128U
	038U	083U	129U
001K	040U	086U	131U
002K	041U	088U	132U
	042U	089U	134U
	043U	090U	135U
001U	044U	092U	136U
002U	046U	093U	137U
003U	047U	094U	138U
004U	048U	095U	139U
005U	049U	096U	140U
006U	050U	097U	141U
007U	051U	098U	142U
008U	052U	099U	143U
009U	054U	100U	144U
010U	055U	101U	146U
013U	056U	102U	147U
014U	057U	103U	148U
015U	058U	104U	150U
016U	059U	106U	151U
017U	061U	108U	152U
020U	063U	110U	153U
021U	064U	111U	154U
022U	065U	112U	155U
023U	068U	113U	
024U	070U	114U	

US Liquids of Detroit, Inc.
Audit Information Guide
Regulatory Agencies

Michigan Department of Environmental Quality:

Department Permitting Contact: Steve Sliver
P.O. Box 30241
Lansing, Michigan 48909

Waste Permit Contact: Jeanette Noechel
Environmental Quality Analyst
Waste Management Division
Michigan Department of Environmental Quality
300 River Place
Suite 3600
Detroit, Michigan 48207
(313) 392-6524

City of Detroit Water and Sewage Department:

Waste Permit Contact: Andrew Anyanonu
Industrial Waste Control Division
City of Detroit Water and Sewage Department
303 S. Livernois
Detroit, Michigan 48209
(313) 297-5851

Wayne County Department of Public Health:

Air Permit Contact: Lee Murchison
Air Pollution Control Inspector
Air Pollution Control Division Enforcement
Wayne County Department of Public Health
640 Temple Street
Suite 700
Detroit, Michigan 48201

US Liquids of Detroit, Inc.
Audit Information Guide
Off-Site Disposal Facilities

USL has approved the following facilities for shipment of our treated residuals:

Waste Management
Woodland Meadows Recycling and Disposal Facility
P.O. Box 79001
CITY Waste Systems
Detroit MI 48279-1548

Republic Environmental
Carleton Farms
P.O. Box 634
New Boston MI 48164

Rockwood Landfill
9450 U.S. Turnpike
Newport MI 48166

Envirosafe – Oregon, OH
P.O. Box 844555
Dallas TX 75284-4458

Wayne Disposal
P.O. Box 67-944
Detroit MI 48267

US Liquids of Detroit, Inc.
Audit Information Guide
Financial Information

USL is listed on the American Stock Exchange under the AMEX symbol USL. The fiscal year ends December 31. The most up to date financial information can be found by accessing the Internet.

CLOSURE COST

The total closure cost estimate as presented in the Closure Plan for USL is $1,526,814.00.

Each year, USL will adjust the closure cost estimate by employing an annual Implicit Price Deflator for Gross National Product as published by the U.S. Department of Commerce in its "Survey of Current Business", as described in 40 CFR 264.142 (c). Since USL is utilizing a corporate guarantee as financial assurance of closure, the closure cost estimate will be updated within 30 days after the close of the facility's fiscal year in accordance with 40 CFR 264.142 (b).

US Liquids of Detroit, Inc.
Audit Information Guide
Waste Approval Procedures
(Addendum A)

For USL to efficiently and effectively provide approvals to our valued customers, we request the following information be provided:

1. If this is the first time you are utilizing our facility and have not established an account as a Customer, please submit a completed Credit Application, found later in this section.

2. A completed USL GENERATOR WASTE PROFILE, a copy immediately follows this guideline.

3. Any completed analytical testing results, current within the last year. Certain waste streams may require specific analytical. Please contact your sales/customer service representative for specifics. Any unused or virgin products may only require a MSDS for approval. If a waste stream contains volatile organic compounds greater than 500 ppm, please indicate, as the waste will be subject to Subpart CC. If a waste stream has less than 500 ppm volatile organic compounds, please consult your sales/customer service representative to determine if a certificate is applicable (a copy is provided after the Waste Profile) or if additional analytical is required (8260/8270).

4. A representative one (1) quart sample for fingerprint analysis. An additional quart sample may be required if USL is providing analytical services.

5. A completed Chain-of-Custody specifying any analytical services requested by USL.

In completing the Generator Waste Profile, the following guidelines may be helpful:

A. For any nonhazardous liquid waste, a State Identification Number is required. This number can be obtained immediately by calling Michigan Department of Environmental Quality at (MDEQ) at (517)373 - 6049.

Before calling, have the information required in the GENERATOR INFORMATION box of the Waste profile. If the material is a hazardous liquid or solid, a Federal EPA Identification Number will be required. Obtaining this number may take a few weeks. Obtaining the number will require the completion of document EPA Form 1270. A copy of the most recent form is at the back of this section. Either the State or Federal Identification Numbers are specific for a particular location, not for an individual generator. If you have recently moved to a new location, call the MDEQ phone number listed above to inquire if an identification number is pre-existing for the location.

B. Please be sure to list on the common name of the waste on the first page of the profile. This will expedite your inquires into the waste acceptance procedure by identifying wastes that need to be recertified and wastes not properly identified on manifests.

C. Be very specific and detailed when completing the WASTE GENERATION DESCRIPTION. For example, if there is a process involved, and there are no listed wastes used in the process, state that in this section. If the process includes a bath and rinse, list whether the bath or the rinse, or both are included in the waste stream. If the material is outdated or unused virgin product, include a copy of the Material Safety Data Sheet with the Profile Sheet.

D. The SHIPPING INFORMATION section should contain the required Department of Transportation (DOT) description of the waste. This description available from your transporter, or through the Hazardous Material Table listed in Book 49 Certified Federal Registry (49 CFR) Section 172.

Please Note: A Michigan Uniform Hazardous Waste Manifest is required for hazardous, nonhazardous liquid, nonhazardous solids with free liquid, and sludge waste. Furthermore, USL does not accept Continuation Sheets for these wastes. A Bill of Lading is acceptable for 100% solid nonhazardous solids.

E. The 22 WASTE CHARACTERIZATION questions enables the USL Approvals Department to evaluate and make certain that your waste stream is properly treated and disposed in accordance with all regulatory agencies. Some of the questions may require laboratory analysis to complete. Do not guess at any questions; call the Customer Service/Sales Department for help in completing this section if needed.

F. Complete the PHYSICAL CHARACTERISTICS section to the best of your ability. Do not leave any area blank.

G. Please be complete and accurate when including all chemical composition elements (analytical requirements may depend on this information).

H. The QUANTITY & CONTAINMENT section MUST LIST ALL forms and sizes of the waste acceptance containers expected to be brought into the facility. If drums, the units must reflect the size of the container (i.e., 55 gallon drum, 30 gallon drum, etc.), if boxes or bags indicate the size of the container (one cubic yard box, 3x3x3 pallet). Once the material is approved, a quote letter will be forwarded to you with the price for the container sizes listed in this section. If material is brought into the facility in a size other than the one specified on the profile, a delay in acceptance may occur. For hazardous material, all manifests must be in gallons, pounds, drum, yard or ton units to comply with taxation.

I. Please complete the SPECIAL REQUIREMENT section with caution. Sometimes, the consequences to an incorrectly answered question are irreversible. For example, a load manifested in yards will not be weighed if it is not requested in this section.

J. The generator signature must be present on the last page of the profile; if any approval is to be granted. Both sections must be signed by the generator. If you are signing as an authorized agent on behalf of the generator, a statement from the generator giving you such authorization must be included with this profile.

Once the profile and analytical have been received and the sample is fingerprinted, an approval number will be given to the customer. USL approvals are Customer/Generator specific and may not be utilized by anyone other than the Customer for that particular Generator.

The approvals are valid for one year. Near the expiration date, USL sends a **Recertification Letter** stating any update requirements that may be needed. The Recertification Letter must be signed by the generator. Nonhazardous waste streams may be re-certified, each year, for three years. On the fourth year an **"Update"** will be required. An Update requires an Update Letter and new analytical for the waste stream. If the material is hazardous, the waste may be recertified, each year, for two years and on the third year an Update will be required.

If an approval is needed for one time only, i.e., clean up, please note this in the QUANTITY AND CONTAINMENT SECTION of the profile. Recertification Letters will not be issued for this type of approval. The approval will be cancelled when the quantity shipped satisfies the amount specified in the profile.

US Liquids of Detroit, Inc.
Audit Information Guide
Waste Acceptance Policy and Procedures

Once the Customer has received his/her waste approval number, the Customer should arrange for transportation and delivery of the waste to the site by a properly licensed Transporter. Until an approval number is assigned, no shipment will be accepted by the site. A confirming letter with the approval number will be forwarded to the Customer.

All liquid waste and all hazardous waste shipped to USL must be accompanied by a properly completed and signed Michigan DEQ Uniform Hazardous Waste Manifest. Each waste stream's approval number should be written in Section "J" of the manifest and appear on the face of the Generator's shipping papers.

If any shipments are coming from out of Michigan, and a Michigan Manifest is not available, contact the Customer Service Department to have a Manifest mailed to the appropriate person.

All vehicles making waste deliveries to USL will first report to USL located at 1923 Frederick Street, Detroit, MI 48211.

All drivers are required to carry their own Personal Protection Equipment (PPE) on their vehicles. They should obey all posted sign or directions provided by USL personnel while on USL property.

Upon arrival at USL, each waste stream will be sampled and fingerprinted in the Waste Acceptance Laboratory (WAL). This fingerprint is compared against the pre-shipment profile and sample to ensure proper waste receipt and documentation. Complete shipping documents will be checked and processed. Upon acceptance of the waste material, the WAL personnel will direct the driver to the proper off-loading site and area.

For any hazardous materials a Land Ban form will be required. Copies of USL Land Ban Forms are included in this section. Any quote letters should list the waste description codes if hazardous and list/or include which Land Ban Forms will be required by USL acceptance.

In general:

FORM A – is required for any Characteristic Waste (D001 – D043); any F006, F019, and F039 Listed Wastes, and any California Listed Waste.

FORM B – is required for any wastes listed on the form being disposed of at the Chemical Fixation Facility, or have wastes containing any underlying constituents for any material being disposed of at the Chemical Fixation Facility.

FORM C – is required for any California Listed Waste.

FORM D – is required for indicating which underlying constituents are present for F001-Foo5 Listed wastes.

GENERATOR WASTE PROFILE

US LIQUIDS
Detroit Treatment Facility

IMS /Profile NO._____
Billing Code: _____
Sales Rep:_____
MID 980-991-566

Common Name of Waste_____

US Liquids of Detroit, Inc.
1923 Frederick Street
Detroit, MI 48211
Ph. (313) 923-0080
Fax (313) 923-0217

A representative sample may be required by *US Liquids of Detroit, Inc.* prior to the approval of this waste stream. Please consult your US Liquids Customer Service or Sales Representative. Generally, a 1 to 5 gallon sample is required for wastewaters, and a 1-liter sample is required for non-wastewaters.

Sample submitted? ☐ yes ☐ no Date shipped: _____ Volume: _____

GENERATOR INFORMATION

Generator Name_____ US EPA ID No._____
Location Name_____ State ID No._____
Site Address_____ SIC CODE_____
City, State, Zip_____ County_____
Mailing Address_____ City, State, Zip_____
Authorized Contact_____ Phone ( )_____
FAX ( )_____
Emergency Contact_____ Phone ( )_____

BILLING INFORMATION

Customer_____ Established Account? ☐ Yes ☐ No
Mailing Address_____ If Yes, Account No._____
City, State, ZIP_____ FAX ( )_____
Technical Contact_____ Phone ( )_____
Accounting Contact_____ Phone ( )_____

WASTE GENERATION DESCRIPTION

Provide a detailed description of the process which generates the waste. (Attach any flow or block diagrams, if available)

_____
_____
_____
_____

WASTE CLASSIFICATION

Is this an EPA or State of Michigan Hazardous Waste? ☐ Yes ☐ No

Provide all applicable waste codes _____

If this is a characteristic (D-coded) hazardous waste, does it contain underlying hazardous constituents? ☐ Yes ☐ No

If yes, identify all applicable underlying hazardous constituents (Attach Form B)_____

_____

Shipping Information-US DOT Description

Shipping Name:_____
Hazard Class:_____
UN/NA Number: _____
Packing Group:_____
Emergency Response Guide #_____
N.O.S. Constituents:_____
_____

Waste Characterization

Based on RCRA Regulations (40CFR261) and Michigan Hazardous Waste Rules (Act 451)

1. Is this waste subject to **Benzene NESHAP** regulations under 40 CFR Part 61, Subpart FF? (If yes, please complete NESHAP worksheet) ☐ Yes ☐ No
2. Does the waste contain PCB's greater than 49 ppm, or, is the waste derived from a source containing PCB's greater than 50 ppm? ☐ Yes ☐ No
3. Is the waste exempt under CESQG regulation 40 CFR 261.5? (If yes, must submit CESQG Certification) ☐ Yes ☐ No
4. Is this waste regulated under **"Subpart CC"** *air emissions standards* having a VOC ≥500 ppmw (if no,use certification below) ☐ Yes ☐ No

PHYSICAL CHARACTERISTICS

Physical state at 70° F:	Phases/Layers:	Odor:	Flash Point:	pH Range:	Density:
☐ Debris ☐ Solid ☐ Powder/Dust ☐ Sludge ☐ Free Liquids ☐ Monolith	☐ Single ☐ Bi-Layered ☐ Multi-Layered Color(s):_____ _____	☐ None ☐ Mild ☐ Strong	☐ <73°F ☐ 74° - 99°F. ☐ 100° - 140°F. ☐ 141° - 200°F. ☐ >200°F ☐ N.A.	☐ <2 ☐ 2 – 3 ☐ 3 – 7 ☐ 7 – 12.5 ☐ >12.5 ☐ N.A.	☐ <0.80 ☐ 0.80 – 1.0 ☐ 1.01 – 1.20 ☐ 1.21 – 1.40 Exact:_____

CHEMICAL/PHYSICAL COMPOSITION

_____ _____% _____ _____%

_____ _____% _____ _____%

_____ _____% _____ _____%

_____ _____% _____ _____%

_____ _____% _____ _____%

_____ _____% _____ _____%

_____ _____% _____ _____%

_____ _____% _____ _____%

_____ _____% _____ _____%

_____ _____% _____ _____%

Total percentage must equal 100% _____%

QUANTITY AND CONTAINMENT DESCRIPTION

Shipping Mode: (Select All Applicable)

	Drum Size	
☐ Bulk Liquid	☐ 85 gal. ☐ 15 gal.	Highway ☐
☐ Bulk Solid	☐ 55 gal. ☐ 5 gal.	Rail ☐
☐ Drums	☐ 30 gal.	
☐ Pallet	☐ 20 gal.	

Other Special Packaging:_____

Shipping Volume:_____

Shipping Frequency: Per Week ☐ Month ☐
Other:_____

SPECIAL REQUIREMENTS

1. Hazardous Tax exempt? ☐ Yes ☐ No
   If yes, certificate is required with each manifest.
2. Purchase order required? ☐ Yes ☐ No
   If yes, please provide number.

BIENNIAL CODES

Source Code: _ _ _ _

Origin Code: _ _ _ _

System Type: _ _ _ _

Fuel Blending:

BTU/lb._____

Chloride _____%

Water _____%

WASTE CHARACTERISTICS

1. Infectious or Biological Waste? ☐ Yes ☐ No
2. NRC Regulated Radioactive? ☐ Yes ☐ No
3. Reactivity: ☐ None ☐ Pyrophoric
   ☐ Water ☐ Cyanide
   ☐ Air ☐ Sulfide
   ☐ Shock ☐ Shock Sensitive
   ☐ Other:_____

I certify that this waste does not contain Volatile Organic Compounds (VOCs) in concentrations greater than 500 ppmw (total). This certification is made based upon my knowledge and/or process generating this hazardous waste and does account for any seasonal or process variability that may effect VOC concentration.

Print:_____ Title:_____

Signed:_____ Date:_____

I certify that all information contained in this profile, including attached information, is complete and factual and is an accurate representation of the known and suspected hazards, and waste generator regulations, pertaining to the waste described herein; and I am an employee and duly authorized representative of the Generator.

Generator agrees to indemnify and hold US Liquids of Detroit, Inc. and its affiliates harmless for any claims, liabilities, damages and costs including, but not limited to, attorney's fees, arising out of or in any way related to breach of the above certification by the generator.

I authorize US Liquids of Detroit, Inc. personnel to obtain a sample from any waste shipment for purposes of verification and confirmation.

Print:_____ Title:_____

Signed:_____ Date:_____

USL City Environmental, Inc.
1923 Frederick Street
Detroit, MI 48211
(313) 923-0080
(313) 923-3375 (Sales Fax)
(313) 923-0217 (Admin. Fax)

APPROVAL NO.

MANIFEST NO. LINE ITEM

<NOTICE>

FROM GENERATOR FOR WASTES THAT DO NOT MEET LAND DISPOSAL TREATMENT STANDARDS

The following wastes do not meet the treatment standards specified in Part 268 Subpart D.

(Check all boxes that apply.)

- ☐ This shipment includes F001-F005 spent solvents, as identified on the attached sheet. (2)
- ☐ This shipment includes F039 multi-source leachate, as identified on the attached sheet(s). (3)
- ☐ This shipment includes D001 and/or D002 wastes as identified below. (1)
- ☐ This shipment includes one or more TC metals D004-D011 identified below. (1)
- ☐ This shipment includes one or more TC organics D012-D043 identified below. (1)

Hazardous Waste No.	Hazardous Subcategory(4)	Treatability group(5)

(1) Must include Form B (Underlying Hazardous Constituents)
(2) Must include Form D (F001-F005)
(3) Must include Form E (F039)
(4) Subcategory (if any) can be determined from 40 CFR 268.40
(5) Treatability group is either "wastewater" or "nonwastewater"

Signature Date

FORM A

USL City Environmental, Inc.
1923 Frederick Street
Detroit, MI 48211
(313) 923-0080
(313) 923-3375 (Sales Fax)
(313) 923-0217 (Admin. Fax)

—NOTIFICATION—

UNDERLYING HAZARDOUS CONSTITUENTS

APPROVAL NO.

MANIFEST NO. LINE ITEM

Circle those constituents reasonably to be expected in the waste at the point of generation above the universal treatment standards listed below. You must identify whether wastewater or nonwastewater.

UNIVERSAL TREATMENT STANDARDS

Constituent	Waste-water total composition (mg/L)	Nonwaste water total composition (mg/kg)
A2213	0.042	1.4
Acenaphthylene	0.059	3.4
Acenaphthene	0.059	3.4
Acetone	0.28	160
Acetonitrile	5.6	38
Acetophenone	0.010	9.7
2-Acetylaminofluorene	0.059	140
Acrolein	0.29	NA
Acrylamide	19	23
Acrylonitrile	0.24	84
Aldicarb sulfone	0.056	0.28
Aldrin	0.021	0.066
4-Aminobipheny	0.13	NA
Aniline	0.81	14
Anthracene	0.059	3.4
Aramite	0.36	NA
alpha-BHC	0.00014	0.066
beta-BHC	0.00014	0.066
delta-BHC	0.023	0.066
gamma-BHC	0.0017	0.066
Barban	0.056	1.4
Bendiocarb	0.056	1.4
Bedniocarb phenol	0.056	1.4
Benomyl	0.056	1.4
Benzene	0.14	10
Benz(a)anthracene	0.059	3.4
Benzal chloride	0.055	6.0
Benzo(b)fluoranthene (difficult to distinguish from benzo(k)fluoranthene)	0.11	6.8
Benzo(k)fluoranthene (difficult to distinguish from benzo(b)fluoranthene)	0.11	6.8
Benzo(g,h,i)perylene	0.0055	1.8
Benzo(a)pyrene	0.061	3.4
Bromodichloromethane	0.35	15
Bromomethane/Methyl bromide	0.11	15
4-Bromophenyl phenyl ether	0.055	15
n-Butyl alcohol	5.6	2.6
Butylate	0.042	1.4
Butyl benzyl phthalate	0.017	28
2-sec-Butyl-4,6-dinitrophenol/ Dinoseb	0.066	2.5

Constituent	Waste-water total composition (mg/L)	Nonwaste water total composition (mg/kg)
Carbaryl	0.006	0.14
Carbenzadim	0.056	1.4
Carbofuran	0.006	0.14
Carbofuran phenol	0.056	1.4
Carbon disulfide	3.8	4.8 mg/l TCLP
Carbon tetrachloride	0.057	6.0
Carbosulfan	0.028	1.4
Chlordane (alpha andgamma isomers)	0.0033	0.26
p-Chloroaniline	0.46	16
Chlorobenzene	0.057	6.0
Chlorobenzilate	0.10	NA
2-Chloro-1,3-butadiene	0.057	0.28
Chlorodibromomethane	0.057	15
Chloroethane	0.27	6.0
bis(2-Chloroethoxy)methane	0.036	7.2
bis(2-Chloroethyl)ether	0.033	6.0
Chloroform	0.046	6.0
bis(2-Chloroisopropyl)ether	0.055	7.2
p-Chloro-m-cresol	0.018	14
2-Chloroethyl vinyl ether	0.062	NA
Chloromethane/Methyl chloride	0.19	30
2-Chloronaphthalene	0.055	5.6
2-Chlorophenol	0.044	5.7
3-Chloropropylene	0.036	30
Chrysene	0.059	3.4
o-Cresol	0.11	5.6
m-Cresol (difficult to distinguish from p-cresol)	0.77	5.6
p-Cresol (difficult to distinguish from m-cresol)	0.77	5.6
m-Cumenyl methylcarbamate	0.056	1.4
Cyclohexanone	0.36	0.75 mg/l TCLP
o,p'-DDD	0.023	0.087
p,p'-DDD	0.023	0.087
o,p'-DDE	0.031	0.087
p,p'-DDE	0.031	0.087
o,p'-DDT	0.0039	0.087
p,p'-DDT	0.0039	0.087
Dibenz(a,h)anthracene	0.055	8.2
Dibenz(a,e)pyrene	0.061	NA

UNIVERSAL TREATMENT STANDARDS (continued)

Constituent	Waste-water total composition (mg/L)	Nonwaste water total composition (mg/kg)
1,2-Dibromo-3-chloropropane	0.11	15
1,2-Dibromoethane/ Ethylene dibromide	0.028	15
Dibromomethane	0.11	15
2,4-D (2,4-Dichlorophen-oxyacetic acid)	0.72	10
m-Dichlorobenzene	0.036	6.0
o-Dichlorobenzene	0.088	6.0
p-Dichlorobenzene	0.090	6.0
Dichlorodifluoromethane	0.23	7.2
1,1-Dichloroethane	0.059	6.0
1,2-Dichloroethane	0.21	6.0
1,1-Dichloroethylene	0.025	6.0
trans-1,2-Dichloroethylene	0.054	30
2,4-Dichlorophenol	0.044	14
2,6-Dichlorophenol	0.044	14
2,4-Dichlorophenoxyacetic acid/2,4-D	0.72	10
1,2-Dichloropropane	0.85	18
cis-1,3-Dichloropropylene	0.036	18
trans-1,3-Dichloropropylene	0.036	18
Dieldrin	0.017	0.13
Diethylene glycol, dicarbamate	0.056	1.4
Diethyl phthalate	0.20	28
p-Dimethylaminoazobenzene	0.13	NA
2-4-Dimethyl phenol	0.036	14
Dimethyl phthalate	0.047	28
Dimetilan[6]	0.056	1.4
Di-n-butyl phthalate	0.057	28
1,4-Dinitrobenzene	0.32	2.3
4,6-Dinitro-o-cresol	0.28	160
2,4-Dinitrophenol	0.12	160
2,4-Dinitrotoluene	0.32	140
2,6-Dinitrotoluene	0.55	28
Di-n-octyl phthalate	0.017	28
Di-n-propylnitrosamine	0.40	14
1,4-Dioxane	12.0	170
Diphenylamine (difficult to distinguish from diphenylnitrosamine)	0.92	13
Diphenylnitrosamine (difficult to distinguish from diphenylamine)	0.92	13
1,2-Diphenylhydrazine	0.087	NA
Disulfoton	0.017	6.2
Dithiocarbamates (total)	0.028	28
Endosulfan I	0.023	0.066
Endosulfan II	0.029	0.13
Endosulfan sulfate	0.029	0.13
Endrin	0.0028	0.13
Endrin aldehyde	0.025	0.13
EPTC	0.042	1.4
Ethyl acetate	0.34	33
Ethyl benzene	0.057	10
Ethyl cyanide/Propanenitrile	0.24	360
Ethyl ether	0.12	160
bis(2-Ethylexyl) phthalate	0.28	28
Ethyl methacrylate	0.14	160
Ethylene oxide	0.12	NA
Famphur	0.017	15
Fluoranthene	0.068	3.4
Flourene	0.059	3.4
Formetanate hydrochloride	0.056	1.4
Formparanate	0.056	1.4
Heptachlor	0.0012	0.066
Heptachlor epoxide	0.016	0.066
Hexachlorobenzene	0.055	10
Hexachlorobutadiene	0.055	5.6
Hexachlorocyclopentadiene	0.057	2.4
HxCDDs (All Hexachlorodibenzo-p-dioxins)	0.000063	0.001
HxCDFs (All Hexachlorodibenzofurans)	0.000063	0.001
Hexachloroethane	0.055	30
Hexachloropropylene	0.035	30
Indeno (1,2,3-c,d) pyrene	0.0055	3.4
Iodomethane	0.19	65
Isobutyl alcohol	5.6	170
Isodrin	0.021	0.066
Isolan	0.056	1.4
Isosafrole	0.081	2.6
Kepone	0.0011	0.13
Methacrylonitrile	0.24	84
Methanol	5.6	0.75 mg/l TCLP
Methapyrilene	0.081	1.5
Methiocarb	0.056	1.4
Methomyl	0.028	0.14
Methoxychlor	0.25	0.18
3-Methylcholanthrene	0.0055	15
4,4-Methylene bis (2-chloroaniline)	0.50	30
Methylene chloride	0.089	30
Methyl ethyl ketone	0.28	36
Methyl isobutyl ketone	0.14	33
Methyl methacrylate	0.14	160
Methyl methansulfonate	0.018	NA
Methyl parathion	0.014	4.6
Metolcarb	0.056	1.4
Mexacarbate	0.056	1.4
Molinate	0.042	1.4
Naphthalene	0.059	5.6
2-Naphthylamine	0.52	NA
o-Nitroaniline	0.27	14
p-Nitroaniline	0.028	28
Nitrobenzene	0.068	14
5-Nitro-o-toluidine	0.32	28
o-Nitrophenol	0.028	13
p-Nitrophenol	0.12	29
N-Nitrosodiethylamine	0.40	28
N-Nitrosodimethylamine	0.40	2.3

UNIVERSAL TREATMENT STANDARDS (continued)

Constituent	Waste-water total composition (mg/L)	Nonwaste water total composition (mg/kg)
N-Nitroso-di-n-butylamine	0.40	17
N-Nitrosomethylethylamine	0.40	2.3
N-Nitrosomorpholine	0.40	2.3
N-Nitrosopiperidine	0.013	35
N-Nitrosopipyrrolidine	0.013	35
Oxamyl	0.056	0.28
Parathion	0.014	4.6
Total PCBs (sum of all PCB isomers, or all Aroclors)	0.10	10
Pebulate	0.042	1.4
Pentachlorobenzene	0.055	10
PeCDDs (All Pentachlorodibenzo-p-dioxins)	0.000063	0.001
PeCDFs (All Pentachlorodibenzofurans)	0.000035	0.001
Pentachloroethane	0.055	6.0
Pentachloronitrobenzene	0.055	4.8
Pentachlorophenol	0.089	7.4
Phenacetin	0.081	16
Phenathrene	0.059	5.6
Phenol	0.039	6.2
o-Phenylenediamine	0.056	5.6
Phorate	0.021	4.6
Phthalic acid	0.055	28
Phthalic anhydride	0.055	28
Physostigmine	0.056	1.4
Physostigmine salicylate	0.056	1.4
Promecarb	0.056	1.4
Pronamide	0.093	1.5
Propham	0.056	1.4
Propoxur	0.056	1.4
Prosulfocarb	0.042	1.4
Pyrene	0.067	8.2
Pyridine	0.014	16
Safrole	0.081	22
Silvex/2,4,5-TP	0.72	7.9
1,2,4,5-Tetrachlorobenzene	0.055	14
TCDDs (All Tetrachlorodibenzo-p-dioxins)	0.000063	0.001
TCDFs (All Tetrachlorodibenzofurans)	0.000063	0.001
1,1,1,2-Tetrachloroethane	0.057	6.0
1,1,2,2-Tetrachloroethane	0.057	6.0
Tetrachloroethylene	0.056	6.0
2,3,4,6-Tetrachlorophenol	0.030	7.4
Thiodicarb	0.019	1.4
Thiophanate-methyl	0.056	1.4
Tirpate	0.056	0.28
Toluene	0.080	10
Toxaphene	0.0095	2.6
Triallate	0.042	1.4
Tribromomethane/Bromoform	0.63	15
2,4,6-Tribromophenol	0.035	7.4
1,2,4-Trichlorobenzene	0.055	19
1,1,1-Trichloroethane	0.054	6.0
1,1,2-Trichloroethane	0.054	6.0
Trichloroethylene	0.054	6.0
Trichloromonofluoromethane	0.020	30
2,4,5-Trichlorophenol	0.18	7.4
2,4,6-Trichlorophenol	0.035	7.4
2,4,5 Trichlorophenoxyacetic acid/2,4,5-T	0.72	7.9
1,2,3-Trichloropropane	0.85	30
1,1,2-Trichloro-1,2,2-trifluoroethane	0.057	30
Triethylamine	0.081	1.5
tris-(2,3-Dibromopropyl) phosphate	0.11	0.10
Vernolate	0.042	1.4
Vinyl chloride	0.27	6.0
Xylenes-mixed isomers (sum of o-,m-, and p-xylene concentrations)	0.32	30
Antimony	1.9	1.15 mg/l TCLP
Arsenic	1.4	5.0 mg/l TCLP
Barium	1.2	21 mg/l TCLP
Beryllium	0.82	1.22 mg/l TCLP
Cadmium	0.69	0.11 mg/l TCLP
Chromium (Total)	2.77	0.60 mg/l TCLP
Cyanides (Total)	1.2	590
Cyanides (Amenable)	0.86	30
Fluoride	35	NA
Lead	0.69	0.75 mg/l TCLP
Mercury -	NA	0.20 mg/l TCLP
Nonwastewater from Retort		
Mercury - All Others	0.15	0.025 mg/l TCLP
Nickel	3.98	11 mg/l TCLP
Selenium	0.82	5.7 mg/l TCLP
Silver	0.43	0.14 mg/l TCLP
Sulfide	14	NA
Thallium	1.4	0.20 mg/l TCLP
Vanadium	4.3	1.6 mg/l TCLP
Zinc	2.61	4.3 mg/l TCLP

☐ **None of the above hazardous constituents are reasonably to be expected in the waste listed in Form A.**

Signature

Date

TREATMENT STANDARDS FOR F001-F005 SPENT SOLVENTS

[Instructions: Check the box beside each waste included in the offsite shipment, circle or otherwise identify the individual constituents likely to be present in each waste.]

Hazardous waste description	Constituents of concern	Nonwastewater: Total composition, mg/kg	Nonwastewater: TCLP, mg/L	Wastewater, coomposition, mg/L
☐ F001 - Spent halogenated solvents used in degreasing	Carbon tetrachloride	6.0	—	0.057
	Methylene chloride	30	—	0.089
	Tetrachloroethylene	6.0	—	0.056
	1,1,1-Trichloroethane	6.0	—	0.054
	Trichloroethylene	6.0	—	0.054
	1,1,2-Trichloro-1,2,2-trifluoroethane[5]	30	—	0.057
	Trichloromonofluoromethane	30	—	0.02
☐ F002 - Spent halogenated solvents	Chlorobenzene	6.0	—	0.057
	o-Dichlorobenzene	6.0	—	0.088
	Methylene chloride	30	—	0.089
	Methylene chloride (wastewater from the pharmaceutical industry)	—		0.44
	Tetrachloroethylene	6.0	—	0.056
	1,1,1-Trichloroethane	6.0	—	0.054
	1,1,2-Trichloroethane	6.0		0.030
	Trichloroethylene	6.0	—	0.054
	1,1,2-Trichloro-1,2,2-trifluoroethane[5]	30	—	0.057
	Trichloromonofluoromethane	30	—	0.02
☐ F003 - Spent non-halogenated solvents	Acetone	160	—	0.28
	n-Butyl alcohol	2.6	—	5.6
	Cyclohexanone[4]		0.75	0.36[4]
	Ethyl acetate	33	—	0.34
	Ethyl benzene	10.0	—	0.057
	Ethyl ether	160	—	0.12
	Methanol[4]		0.75	5.6[4]
	Methyl isobutyl ketone	33	—	0.14
	Xylenes (total)	30	—	0.32
☐ F004 - Spent non-halogenated solvents	Cresol (m- and p-isomers)	5.6	—	0.77
	o-Cresol	5.6	—	0.11
	Nitrobenzene	14	—	0.068
	All Cresol mixed Isomers	11.2	—	0.88
☐ F005 - Spent non-halogenated solvents solvents	Benzene	10		0.14
	Carbon disulfide[4]		4.8	3.8
	2-Ethoxyethanol	Incineration[1]		Biological degradation or incineration[2]
	Isobutyl alcohol	170	—	5.6
	Methyl ethyl ketone	36	—	0.28
	2-Nitropropane	Incineration[1]		(Wet oxidation or chemical oxidation followed by carbon adsorption; or incineration[2])
	Pyridine	16	—	0.014
	Toluene	10	—	0.08

[1]Five-letter code is "INCIN"

[2]Five-letter codes are "BIODG; or INCIN".

[3]Five-letter codes are "(WETOX or CHOXD) fb CARBN; or INCIN".

[4]The treatment standards for carbon disulfide, cyclohexanone, and methanol nonwastewaters are based on the TCLP and apply only to spent solvents containing only one, two or all three of these constituents. If a waste contains any of these three constituents along with any of the other constituents found in F001-F005, then only the treatment standards for the other constituents apply (i.e., the standards for carbon disulfide, cyclohexanone, and methanol do not apply when other constituents are present). It appears that EPA made a technical error when it modified Tables CCW and CCWE in the August 18, 1992 final rule, because wastewater standards for these three constituents do not appear in either table. In the preamble to that rule, EPA indicates that the wastewater standards are 0.014 mg/L for carbon disulfide, 0.35 mg/L for cyclohexanone, and 5.6 mg/L for methanol. (57 FR 37205)

[5]The constituent of concern given here is believed to be correct. Although the August 18, 1992 final rule identifies the constituent as 1,1,2-trichloro-1,2,2trifluoromethane, historically the constituent has always been identified as 1,1,2-thrichloro-1,2,2-trifluoroethane.

FORM D

TROUBLESHOOTING GUIDE FOR SHIPPING GOOD QUALITY DRUMS TO U.S. LIQUIDS

CRITERIA	INDICATOR	RESOLUTION
Structural Condition	Dents: No obvious structural impairment.	OK
	Obvious, large depressions.	Repack or Overpack
	Structural impairment possible.	Repack or Overpack
	Creases: Less than 6", no metal loss.	OK
	More than 6", metal separation,	Repack or Overpack
	Obvious impairment.	Repack or Overpack
	Obvious damage to chime or seam.	Repack or Overpack
	Lid damage.	Replace lid or Repack
Dirty Drums		
Metal:	Streaks, runs, splatters, etc.	Wipe clean or repaint
Fiber:	Stains on outside, waste on outside.	Wipe clean or Repack
	Material leaking.	Repack or Overpack
Rusting:	Less than 50% of surface, incidental rust, no apparent structural damage.	OK
	More than 50% of surface, with or without structural impairment.	Repack or Overpack
Labeling:	Missing or illegible EPA/DOT labels.	Replace labels
	Missing or illegible Profile number or manifest number.	Paint or grease pencil number on drum

US LIQUIDS
Detroit Treatment Facility

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HOW TO SHIP GOOD QUALITY DRUMS TO U.S. LIQUIDS

1. SELECT THE PROPER DRUM

USE PROPER DOT specification for hazard class.
VERIFY waste is compatible with drum type.
USE NEW or reconditioned clean drums.
VERIFY container is labeled with UN standard.

2. CLEAN THE DRUM

WIPE OFF THE TOP. Remove dust, grease and splatters.
WIPE OFF SIDES. Look closely; don't let paint splatters, waste globs or dirty smudges go unnoticed.
USE AN EXTERIOR DRUM APRON when filling. Polyethylene works well.
USE FUNNELS for liquids when possible.
LABEL CONTAINER when waste is first placed in drum. Record accumulation start date on label.

3. INSPECT THE DRUM

BUNG SEALED TIGHTLY?
LID SECURE? Ring gasket secure? Ring tightened? Bolt loops down?
VENT CAP PRESENT AND SECURE?
REQUIRED EPA AND DOT LABELS ON DRUM?
VERIFY absence of creases, ridges, excess rusting, dents and crumples.
VERIFY that major drum seal is intact; chimes, base and lip are not damaged.
PAINT OR WRITE IN PERMANENT MARKER the USL approval number on the top of the drum in a contrasting color.

4. MANIFEST THE DRUM

Do the DOT descriptions on the manifest match the label?
Use Michigan manifest for all hazardous waste AND Nonhazardous liquids
Land Ban forms are needed for each hazardous line item
USE THE CORRECT DOT DESCRIPTION

US LIQUIDS

Detroit Treatment Facility

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